



## **HEARING STATEMENT**

### **Examination of the Breckland District Local Plan (2011 – 2036)**

On behalf of:

**Orbit Homes (2020) Limited**

In respect of:

**Land off Greenfields Road, Dereham**

Date:

**March 2018**

Document Reference:

**Reference: GA/DJ/05217/S0001**

## 1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Orbit Homes (2020) Limited (henceforth 'Orbit Homes') in response to the Inspector's Schedule of Matters and Issues for the Examination into the Breckland District Local Plan (2011-2036) (Document Reference EX.18). The Statement is intended to assist the Inspector's consideration of the soundness of the Plan and aid discussion at the examination hearing sessions commencing on the 17<sup>th</sup> April 2018.
- 1.2 On behalf of Orbit Homes, Armstrong Rigg Planning wish to take part in the following hearing sessions:

<b>Date</b>	<b>Matter</b>
Wednesday 18 <sup>th</sup> April 2018	<b>Matter 3</b> – Housing: the objectively assessed need for housing and the housing requirement (Policy HOU 01)
Thursday 19 <sup>th</sup> April 2018	<b>Matter 4</b> – Housing: the supply of land for housing, deliverability and viability
Wednesday 16 <sup>th</sup> May 2018	<b>Matter 12</b> – Environment (Policy ENV 04)
Wednesday 6 <sup>th</sup> June 2018	<b>Matter 14</b> – Housing Site Allocations (Dereham & Watton)

### Background to Orbit Homes (2020) Limited

- 1.3 Orbit Homes is the development arm of Orbit Group, a Registered Social Provider and non-profit making company who re-invest any surplus revenue generated from Orbit Homes' market sales into the delivery of affordable housing, enabling them to continue to provide high quality affordable homes without dependence on public subsidy. They own a wide range of family homes, sheltered apartments, mobility homes and first-time buyer properties across the country including a focus on the eastern region and Norfolk in particular.
- 1.4 Orbit Homes have owned the Land at Greenfields Road, Dereham (henceforth 'the site'), for over 2 years which is allocated for the development of 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012) and is identified on the Dereham Policies Map for the emerging Breckland District Local Plan (2011-2036) (henceforth 'Local Plan') as a Saved Residential Allocation. Despite this, however, Policy D2 is not mentioned as a Saved Policy within the text of the Local Plan, leading to some confusion regarding its status.
- 1.5 In November 2016, Orbit Homes submitted a full planning application for 285 (since reduced to 279) dwellings on the site (Ref: 3PL/2016/1397/F). This application is still pending determination, having been recommendation for approval by officers in three different committee reports, but deferred twice due to

concerns raised by Dereham Town Council regarding the correct level and type of outdoor playing space required (see discussion under Matter 12 below) and once at the request of Orbit to allow time for the submission of a viability assessment. Prior to the submission of Orbit Homes' application, the site's previous owner gained outline planning permission for 220 dwellings (Ref: 3PL/2011/0898/O).

- 1.6 The proposed increase in the level of development on the site from 220 to 279 dwellings, represents a more sustainable and efficient use of the precious resource that is housing land. The suitability of the site for this level of development is demonstrated by the fact that officers have recommended the current application for approval three times. The increase would also help to meet Breckland District's true OAN which we consider to be higher than that identified in the Central Norfolk Strategic Housing Market Assessment (see Matter 3 below) and would deliver a higher number of homes in the early years of the plan to counteract the Local Plan's reliance on a stepped housing trajectory which we consider to be wholly unjustified (see Matter 4 below). Representations have consistently been made to promote the re-allocation of the site in the Local Plan for the proposed higher level of development, but despite this and the current planning application, it remains unclear whether the site's existing allocation is even proposed to be saved.

## 2.0 MATTER 3 – HOUSING: THE OBJECTIVELY ASSESSED NEED FOR HOUSING AND THE HOUSING REQUIREMENT (POLICY HOU1)

### Background

2.1 Policy HOU 01 states that, in accordance with the Objectively Assessed Need (OAN) in the Central Norfolk Strategic Housing Market Assessment 2017 (SHMA), the Local Plan will provide for no less than 15,298 new homes between 2011 and 2036, an average of 612 dwellings per annum.

2.2 Under Matter 3, the Inspector sets out a series of questions relating to whether the OAN is justified, whether it has been established using a methodology consistent with Planning Practice Guidance (PPG) and whether the housing requirement should be further uplifted to account for the Greater Norwich City Deal. Orbit Homes' representations to the Breckland Local Plan Pre-Submission Publication (September 2017) raised concern regarding the failure of the SHMA to adequately consider market signals and specifically housing affordability in calculating an appropriate uplift on household projections. This section expands upon this point by answering the following inspector's questions that are considered relevant to Orbit Homes' original representations:

- Question 3.1 – Is the Objectively Assessed Need (OAN) figure of 612 dwellings per annum (dpa) as identified in the Strategic Housing Market Assessment (SHMA) justified?
- Question 3.2 – Does the SHMA methodological approach to establishing the OAN follow the advice set out in the Planning Practice Guidance (PPG) (under the heading 'Methodology: assessing housing need')?
- Question 3.5 – A further uplift of 8.5% has been added to reflect market signals (to improve affordability). How has this figure been arrived at and is it justified? Is the uplift sufficient to address affordability issues?
- Question 3.6 – Is it justified and consistent with the PPG methodology to subtract the uplift from concealed families and homeless households from market signals uplift?

2.3 Planning Practice Guidance (PPG) (ID: 2a-020) details how plan makers should respond to market signals. It states that a worsening trend in any of the indicators set out at ID: 2a-019 (including land prices, house prices, affordability and rate of development, etc...) requires an upward adjustment to planned housing numbers compared to ones based solely on housing projections. In areas where adjustments are required, it states that plan makers should set this at a level that is reasonable and that the more significant the

affordability constraints, the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be. ID 2a-020 states that appropriate comparisons of indicators should be made, including comparisons with longer term trends and comparisons with similar demographic and economic areas and nationally.

- 2.4 The Central Norfolk Strategic Housing Market Assessment's (SHMA) response to the market signals for the Central Norfolk Housing Market Area (HMA) is to propose an uplift of 10% across the entire area, which is then reduced to an 8.5% uplift due to an adjustment having already been made for concealed and homeless households. This section starts by dealing with the justification for reducing the 10% uplift in line with the adjustment made for concealed and homeless households (**Question 3.6**), before discussing the justification for applying a 10% uplift (**Question 3.5**). It then provides an answer to the broader questions of whether the OAN is justified (**Question 3.1**) and whether it was prepared in line with the PPG (**Question 3.2**), before detailing the changes we consider to be required to make the plan sound.

**Question 3.6 – Is it justified and consistent with the PPG methodology to subtract the uplift from concealed families and homeless households from market signals uplift?**

- 2.5 The approach taken by the Council in offsetting the adjustment made to the demographic base for concealed families and homeless households against market signals uplift is not consistent with paragraph 2a-015 of PPG. This paragraph considers adjustments for suppressed household formation to be part of the demographic starting point rather than an uplift relating to market signals. These are households that exist but that have not been captured by the household projections and are households that are currently in need of new homes. We consider such households to form part of the baseline need and to subtract them from the market signals uplift is inconsistent with national guidance.
- 2.6 Figure 95 of the SHMA, identifies that the baseline housing need, including the 310 home adjustment for concealed and homeless households, is 14,217 dwellings. **Applying a 10% uplift to this figure gives an OAN of 15,639 dwellings or 626 per year** compared to the currently identified 15,298 dwellings, or 612 per year.

**Question 3.5 – A further uplift of 8.5% has been added to reflect market signals (to improve affordability). How has this figure been arrived at and is it justified? Is the uplift sufficient to address affordability issues?**

- 2.7 As discussed above, this further uplift of 8.5% is a result of the SHMA reducing the proposed 10% market signals uplift by 1.5% to account for an adjustment made for concealed and homeless households. Under Question 3.6 above, we demonstrate that this reduction is inconsistent with national guidance in the PPG

and the 10% uplift should therefore be applied to the baseline figure including the adjustment for concealed and homeless households. Question 3.5 therefore becomes whether the 10% market signal uplift is justified and sufficient to address affordability issues.

2.8 In this regard, we agree with the SMHA's assessment, that the market signals set out in chapter 4 indicate that an uplift is required. We do not, however, consider the proposed uplift of only 10% to be sufficient or justified in the context of poor levels of affordability across the HMA, and particularly in Breckland. There are two key issues with the SHMA's assessment in this regard:

1. The SHMA does not attempt to differentiate between different affordability levels in different parts of HMA and therefore proposes the same uplift in Norwich where affordability is much less of an issue than it is in Breckland; and
2. The SHMA provides no justification for how the figure of 10% has been reached based on the market signal data collected.

#### Affordability in Central Norfolk and Breckland

The SHMA concludes (See paragraph 4.67 and Figure 78) that lack of affordability (in terms of the ratio between lower quartile house prices and lower quartile earnings – based on 2015 figures) is higher in Central Norfolk than across England as a whole (8.3 cf. 7.0) and is also higher than the comparator area Greater Lincoln (8.3 cf. 6.8). It is however consistent with Greater Ipswich (8.3 cf. 8.4) and at a lower rate than Greater Exeter (8.3 cf. 9.1). In addition, the SHMA states that affordability ratios have got "worse" since 2010, with the ratio in Central Norfolk increasing from 7.7 to 8.3, a change of 8%. It states that this is a greater change than the equivalent rate for England, where the ratio increased from 6.7 to 7.0, a change of 5%.

2.9 These figures therefore demonstrate that there is a worsening trend in affordability and that this trend and affordability levels overall are worse in Central Norfolk than they are in England as a whole, although they are broadly comparable with other similar demographic and economic areas. In accordance with the PPG (ID: 2a-020) there is therefore a requirement for an uplift in planned housing numbers compared to those based solely housing projections. We can therefore conclude that the SHMA is justified in proposing an uplift, but the question of what the most appropriate uplift to deal with affordability issues is requires further assessment.

2.10 In terms of the level of uplift required to deal with affordability issues, the PPG (ID: 2a-020) states where adjustments are required, plan makers should set this at a level that is reasonable and that the more significant the affordability constraints, the larger the improvement in affordability needed and, therefore,

the larger the additional supply response should be. It further advises that that appropriate comparisons of indicators should be made, including comparisons with longer term trends and comparisons with similar demographic and economic areas and nationally.

- 2.11 In this respect the SHMA fails to both provide an appropriate comparison of the different authorities within the HMA and fails to consider longer term trends in the affordability ratio. Table 1 below provides a comparison of the increase in the lower quartile affordability ratio for the 5 authorities in the HMA. It demonstrates that the SHMA fails to identify that affordability ratios are far “worse” in the rural areas of the HMA compared to Norwich itself and that of the rural areas, Breckland is one of the worst performing.

**Table 1. Increase in Lower-Quartile Affordability Ratios 2000-2015 (Source: Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2016, Office for National Statistics, 17<sup>th</sup> March 2017)**

Area	Affordability Ratio				Percentage Change		
	2000	2005	2010	2015	Since 2000	Since 2005	Since 2010
<b>Breckland</b>	3.98	7.86	8.21	8.65	+117%	+10%	+5%
<b>Broadland</b>	5.02	9.32	8.24	8.96	+78%	-4%	+9%
<b>North Norfolk</b>	4.44	9.07	8.21	8.12	+83%	-10%	-1%
<b>Norwich</b>	3.41	7.50	6.63	7.28	+113%	-3%	+10%
<b>South Norfolk</b>	4.05	8.00	8.20	8.51	+110%	+6%	+4%
<b>East Anglia</b>	4.33	7.88	7.79	8.53	+97%	+8%	+9%
<b>England</b>	3.85	6.82	6.86	7.11	+85%	+4%	+4%

(N.B. The data in Table 1 differs slightly from the figures presented in the SHMA. This is due to the SHMA methodology altering these figures to account for ratios prior to 2013 having been calculated using a different source of house price data. The methodology used to alter the figures has not been published and it is therefore not possible to reproduce it here).

- 2.12 The affordability ratio for Breckland was 8.65 in 2015, which was higher than the Central Norfolk average (8.65 cf. 8.3), the average for England (8.65 cf. 7.0) and that for Greater Lincoln (8.65 cf. 6.8) and Greater Ipswich (8.65 cf. 8.4). In fact, of the comparator areas chosen in the SHMA, Breckland’s affordability ratio was only lower than Greater Exeter (8.65 cf. 9.1).
- 2.13 Breckland therefore performs far worse than Central Norfolk as a whole in terms of its relative affordability compared to other areas with similar demographic and economic profiles. In addition, while the percentage change in affordability ratios in Breckland was comparable to other areas within the HMA between 2010 and 2015 (+5% cf. between -1% and +10%), a comparison of figures over the longer term from 2000 to 2015 shows that the affordability ratio in Breckland has increased at a significantly higher rate than the other parts of Central Norfolk (+117% cf. between +78 and +113%), East Anglia as a whole (+117% cf. +97%) and England as a whole (+117% cf. 85%).
- 2.14 Breckland is now more than twice as expensive than it was in 2000, which represents a crippling increase

for young adults trying to get on the housing ladder. Its affordability constraints are clearly significantly worse than the other authorities in the HMA and a larger improvement in affordability and therefore a larger uplift in additional supply is needed in accordance with the PPG.

#### Level of Uplift

2.15 The only justification provided in the SHMA for the proposed 10% uplift is provided at paragraph 4.69 which states:

*"In terms of the 10% uplift that we have recommended this is consistent with responses that we have proposed across the country including:*

- *Cheshire East – 3%*
- *Bedford = 5%*
- *Luton and Central Bedfordshire = 10%*
- *Milton Keynes = 10%*
- *Stevenage and North Hertfordshire – 10%*
- *Buckinghamshire = 15%*
- *Outer North East London = 15%*
- *West Essex and East Herts = 20%*
- *Outer East London = 20%*
- *Camden = 20% "*

2.16 At no point does the SHMA provide any analysis of how the market signals in these areas were similar or different to those in Central Norfolk, it simply recommends a figure that it roughly in the middle of what has been applied elsewhere and considers this to be justified because of this 'consistency'. It may be that the locations listed above that provide a 10% uplift are comparable to Central Norfolk in terms of market signals, but there is no analysis in the SHMA to demonstrate this.

2.17 It is beyond the scope of this statement to conduct a thorough analysis of how Central Norfolk compares to other Housing Market Areas. This analysis is also considered to be unnecessary as there is now clear guidance in the Draft Planning Practice Guidance (March 2018)<sup>1</sup>, which builds on the recommendations of the Local Plan Expert Group in March 2016<sup>2</sup> and the government's consultation on the Planning for the right homes in the right places in September 2017<sup>3</sup>, on using median quartile house price ratios to calculate required uplift.

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<sup>1</sup> Draft Planning Practice Guidance, Ministry of Housing, Communities and Local Government, March 2018, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/687239/Draft\\_planning\\_practice\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf)

<sup>2</sup> Report to the Communities Secretary and to the Minister of Housing and Planning, Local Plan Experts Group, March 2016, <http://lpeg.org/#documents>

<sup>3</sup> Planning for the Right Homes in the Right Places: Consultation Proposals, Department for Communities and Local Government, September 2017, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/652888/Planning\\_for\\_Homes\\_Consultation\\_Document.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf)

- 2.18 The Local Plan Expert Group's recommendations to central government recommend at Appendix 6 that where the ratio of median quartile house prices to median earnings is above 7 and less than 8.7 (Breckland's median quartile ratio for 2016 was 8.19<sup>4</sup>), a 20% uplift should be applied. Furthermore, using the proposed standard methodology contained in the Draft PPG and the Planning for the right homes in the right places consultation, the levels of affordability in the district would require a 26.19% uplift against household projections.
- 2.19 Whilst the standard methodology can only be given limited weight as it is not yet adopted national policy, it does give a clear indication of the level of uplift in relation to market signals that the government consider to be reasonable. We would therefore consider an uplift of an additional 10% on the current uplift to be more appropriate to provide a meaningful adjustment to account for market signals and in particular the clear affordability issues in Breckland.
- 2.20 A total uplift of 20% would result in an increase of 2,843 dwellings to the baseline figure of 14,217 contained at Figure 95 of the SHMA, giving **a revised OAN of 17,060 dwellings, or 682 per year** compared to the currently identified 15,298 dwellings, or 612 per year.

**Question 3.1 – Is the Objectively Assessed Need (OAN) figure of 612 dwellings per annum (dpa) as identified in the Strategic Housing Market Assessment (SHMA) justified?**

- 2.21 It should be clear from the above discussion that the current proposed uplift of 8.5% is unjustified. Firstly, the SHMA is unjustified in subtracting concealed and homeless households from the baseline figure as the PPG clearly states that concealed household should be considered to represent part of the baseline. Secondly, the SHMA fails to adequately assess and compare the specific affordability issues affecting Breckland. This leads it to propose an uplift that is insufficient to address the affordability issues affecting the authority and that does not therefore represent an appropriate strategy for the growth of the district.

**Question 3.2 – Does the SHMA methodological approach to establishing the OAN follow the advice set out in the Planning Practice Guidance (PPG) (under the heading 'Methodology: assessing housing need')?**

- 2.22 Similarly, to the question of justification, it should be clear from the above discussion that the SHMA methodological approach to establishing the OAN is not in accordance with the PPG (under the heading 'Methodology: assessing housing need'). Most obviously, in offsetting the adjustment made to the

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<sup>4</sup> Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2016, Office for National Statistics, 17<sup>th</sup> March 2017, <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

demographic base for concealed families and homeless households against market signals uplift, the SHMA methodology is directly contrary to ID: 2a-015 of the PPG which considers adjustments for suppressed household formation to be part of the demographic starting point rather than an uplift relating to market signals.

- 2.23 In addition, the SHMA methodology clearly fails to adequately compare the specific affordability issues facing Breckland with other comparable areas and fails to compare longer term trends in affordability. This results in a critical underestimation of the affordability issues facing Breckland and it must therefore be concluded that the SHMA methodology is not in accordance with ID: 2a-020 of the PPG.

**Suggested Changes to the Plan**

- 2.24 In order to make the plan sound, we consider that a 20% uplift should be applied to the true baseline housing need figure of 14,217 dwellings, giving **a revised OAN of 17,060 dwellings, or 682 per year**. Policy HOU 01 should therefore be amended as follows:

**Policy HOU 01- Development Requirements (Minimum)**

To enable the District to meet future housing needs the Local Plan will provide for no less than ~~15,298~~ 17,060 new homes between 2011 and 2036, an average of ~~612~~ 682 dwellings per annum.

### **3.0 MATTER 4 – HOUSING: THE SUPPLY OF LAND FOR HOUSING, DELIVERABILITY AND VIABILITY**

#### **Background**

- 3.1 Policy HOU 01 sets a housing requirement of 15,298 new dwellings over the plan period, or 612 per year. It proposes a stepped housing trajectory with a housing requirement of 584 per year from 2017/18 - 2021/22 which is then proposed to increase to 622 per year from 2021/22.
- 3.2 Policy HOU 02 sets the level of development proposed to come forward in each settlement through existing completions/commitments, saved allocation and proposed new housing allocations. In total it identifies 15,950 dwellings to be delivered during the plan period, giving a buffer of 4% above the currently identified OAN.
- 3.3 Under Matter 4, the Inspector sets out a series of questions relating to whether the plan is justified in allocating a level of development above the OAN, whether projected completions in the housing trajectory are deliverable and viable, how the projected delivery for each settlement has been calculated, how the Council's five year housing land supply should be calculated and whether the proposed stepped trajectory is justified. Orbit Homes' representations to the Breckland Local Plan Pre-Submission Publication (September 2017) raised concern regarding: the over-reliance of the Local Plan on the delivery of two Sustainable Urban Extensions (SUEs) at Attleborough and Thetford; the resultant need to rely on a stepped housing trajectory due to the bulk of the delivery at these urban extensions being forecast for the latter part of the plan period; and the failure of the Local Plan to re-allocate Orbit Homes' site at Greenfields Road, Dereham for residential development or to recognise its capacity to achieve a higher level of development than currently allocated. This section expands upon these points by answering the following questions are considered relevant to Orbit Homes' original representations:
- Question 4.3 – Are the projected completions in the Housing Trajectory based on a realistic assessment of the likely timing of housing delivery? What evidence is there to support the completions shown for each year, and what assumptions have been made?
  - Question 4.6 Part a) – Are there saved housing allocations? If so, should these become new allocations?
  - Question 4.10 – Is the proposed stepped trajectory justified?

**Question 4.3 – Are the projected completions in the Housing Trajectory based on a realistic assessment of the likely timing of housing delivery? What evidence is there to support the completions shown for each year, and what assumptions have been made?**

- 3.4 Policy HOU 02 requires just over 50% of new homes over the plan period to be delivered in the Sustainable Urban Extensions (SUEs) at Attleborough and Thetford. The SUEs are not predicted to start delivering houses for several years and very little information is provided within the local plan or its evidence base to demonstrate that the projected number of homes at each SUE is deliverable during the plan period.
- 3.5 Of notable absence in the evidence base is a detailed housing trajectory for the entire plan period for each of the allocated sites. This makes it difficult to assess whether the projected completions at the two SUEs are based on a realistic assessment. Despite this, it is possible to conduct a basic assessment of each SUE based on industry average delivery rates in order to broadly test the Council's projections:

- **Attleborough SUE:**

Land South of Attleborough is allocated for a Sustainable Urban Extension (SUE) of 4,000 homes, with 2,650 dwellings projected to be delivered within the plan period. An outline planning application is currently pending on the site for 4,000 dwellings that was validated on 1<sup>st</sup> August 2017 (Ref: 3PL/2017/0996/O). Industry evidence<sup>5</sup> suggests that the planning approval period for sites of greater than 2,000 homes on average takes just over 6 years, with a further few months from planning permission to first completion taking the total time from the submission of the first planning application to the delivery of the first home to just under 7 years.

On this basis, it is reasonable to expect the Attleborough SUE to start delivering houses in 2024-25, following which sites of this size deliver on average 161 dwellings per year, meaning it is reasonable to expect the Attleborough SUE to deliver approximately 2,000 homes within the remaining 12 years of the plan. These are obviously average figures and it would be possible for the Attleborough SUE to achieve planning consent more quickly and potentially to deliver more than 161 dwellings a year (although the annual demand for properties in what is a small town is likely to constrain delivery rates). It is clear, however, that the Council's projected delivery of 2,650 looks ambitious and more investigation is clearly needed into the assumptions made by the Council in terms of timescales for planning and subsequent delivery rates.

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<sup>5</sup> Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?, Lichfields, November 2016, <http://lichfields.uk/content/insights/?article=start-to-finish-how-quickly-do-large-scale-housing-sites-deliver>

- **Thetford SUE:**

Land North of Thetford is an existing allocation for 5,000 homes which is forecast to deliver a significant number of homes during the plan period, but the exact number is difficult to ascertain from the available information. Policy HOU 02 states that 3,668 homes will be delivered in Thetford during the plan period, but it doesn't say whether all these homes are part of the SUE or whether some are existing completions/commitments. It is reasonable to assume, however, that the vast majority of the 3,668 homes are part of the SUE.

Planning permission for the 5,000 home SUE was granted in 2014 (Ref: 3PL/2011/0805/O), but it is understood there have been significant delays in the commencement of development due to the need for largescale infrastructure improvements. The Housing Land Supply Statement (July 2017) predicts that delivery will start on the SUE in 2019/20 with 20 homes delivered, followed by 50 homes in 2020/21 and 100 in 2021/22. The trajectory does not include detailed information for the remainder of the plan period, but based on industry standard delivery rates, it is reasonable to expect Thetford SUE to deliver approximately 161 homes a year for the remaining 14 years of the plan period, giving a realistic estimate of 2,500 homes to be delivered up to 2036. In this regard, the Council's projected delivery of circa 3,668 again looks ambitious and more investigation is clearly needed into the assumptions made by the Council in terms of delivery rates.

- 3.6 In conclusion, with the information available it is difficult to make a full assessment of how realistic the Council's delivery assumptions are, but it is nonetheless clear that on the two SUEs the Councils projected completions are very optimistic and will likely lead to a shortfall against predicted delivery during the latter part of the plan period. The Local Plan cannot therefore be considered to be effective or sound.

**Question 4.6 Part a) – Are there saved housing allocations? If so, should these become new allocations?**

- 3.7 The answer to this question depends on whether you look at the text of the Local Plan or the Policies Map. On the Local Plan Policies Map for Dereham, two sites (Policies D1 and D2) are identified as Saved Residential Allocations. Despite this, however, the Local Plan does not list these allocations as having been saved. In fact, the only saved allocations it does mention are the Thetford SUE and several saved employment allocations. This is a clear inconsistency that needs to be resolved for the plan to be effective at delivering its planned growth.
- 3.8 To ensure clarity regarding the saved allocations, we consider that they should be re-allocated in the Local Plan and that an assessment should be undertaken of each saved allocation to ensure the policy reflects the most effective and efficient use of the site.

- 3.9 The need for clarity and re-assessment is particularly pressing for Orbit Homes' site at Greenfields Road, Dereham ('the site'). The site is allocated for the development of 220 dwellings by Policy D2 of the Council's Site Specific Policies and Proposals Development Plan Document (2012) and is identified on the Local Plan Policies Map for Dereham as a Saved Residential Allocation. Despite this, however, Policy D2 is not mentioned as a Saved Policy within the text of the Local Plan, leading to some confusion regarding its status.
- 3.10 The Local Plan Policies Map for Dereham also identifies the site as having planning permission for housing, which is no longer the case. Outline planning permission for 220 dwellings (Ref: 3PL/2011/0898/O) on the site was granted in May 2014, but rather than submit a reserved matters application for this level of development Orbit Homes submitted a full planning application for 285 dwellings (since reduced to 279) on the site in November 2016 (Ref: 3PL/2016/1397/F). This application is still pending determination and the original outline planning permission lapsed in May 2017. The site is also identified in the Housing Land Supply Statement (July 2017) as a site with planning permission for housing, which was clearly incorrect at the time of publication.
- 3.11 The Housing Land Supply Statement (July 2017) identifies the site as delivering 135 dwellings within the current 5 year period. In order to ensure that this can be achieved, the Local Plan needs to provide clarity with regards to the policy position of the site. The current application seeks an increase of 59 dwellings above the housing allocation of 220 dwellings. Having been recommended for approval by officers in three different planning committee reports<sup>6</sup>, it is clear that officers consider the site to be appropriate for this higher level of development.
- 3.12 It is recognised that despite the most recent recommendation, the application was deferred at planning committee due to concerns raised by Dereham Town Council regarding the correct type of outdoor playing space required. This point is discussed under Matter 12 below, but it is important to note at this stage that the issues raised by the Town Council concern the type of provision required and not the quantity of provision. The current proposal overprovides in terms of quantity of outdoor playing space and the issues raised do not therefore impact on the suitability of the site for 279 dwellings as it is large enough to sustainably accommodate this number.
- 3.13 Representations have consistently been made to promote the re-allocation of the site in the Local Plan for the proposed higher level of development, but despite this and the current planning application, it remains unclear whether the site's existing allocation is even proposed to be saved. To ensure delivery

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<sup>6</sup> Planning Committee Report, 8<sup>th</sup> May 2017, <http://democracy.breckland.gov.uk/ieListDocuments.aspx?Cid=124&Mid=3870>  
Planning Committee Report, 31<sup>st</sup> July 2017, <http://democracy.breckland.gov.uk/ieListDocuments.aspx?Cid=124&Mid=4058>  
Planning Committee Report, 18<sup>th</sup> December 2017, <http://democracy.breckland.gov.uk/ieListDocuments.aspx?Cid=124&Mid=4063>

on this site, which already forms part of the Council's 5 year housing land supply, we therefore consider that it should be re-allocated for the higher level of development proposed by the current application. This would provide the added security of an allocation and ensure that there are no delays in achieving planning consent on the site.

#### **Question 4.10 – Is the proposed stepped trajectory justified?**

- 3.14 Policy HOU 01 of the Local Plan proposes the use of a stepped trajectory with a housing requirement of 584 dwellings per year being set for the 5 years from 2017/18 - 2021/22, which would then increase to 622 per year for the remainder of the plan period. At paragraph 3.3 the plan states that:

*"The housing trajectory includes a stepped approach to housing delivery, reflecting the delivery time lines of the two Sustainable Urban Extensions in Thetford and Attleborough"*

and at paragraph 3.6 it states that:

*"3.6 The Local Plan seeks to deliver the most sustainable approach to development outside the strategic urban extensions (SUEs) of Attleborough and Thetford for distributing growth across the sustainable settlements in the District and achieving a more balanced approach in housing development between rural and urban areas in line with the Strategic Vision, local and market demands. In meeting the requirements of providing 15,298 homes over the plan period between 2011 and 2036 a stepped approach has been taken in the housing trajectory (appendix 1) to reflect an increase in delivery to coincide with commencement of SUE delivery."*

- 3.15 There is little guidance in the current PPG on the acceptability of using a stepped trajectory, but in the new Draft Planning Practice Guidance (March 2018)<sup>7</sup>, a clear indication is given of when the use of a stepped trajectory is justified. On page 17 of the Draft PPG, it states:

*"As an alternative to using an annual average requirement, plan makers are able, where justified, to reflect their plan trajectory more closely by using a series of stepped requirements. A stepped requirement may be necessary where there is to be a significant change in the level of housing requirements between the emerging and previous adopted plan and/or where strategic sites are likely to be delivered later in the plan period. Plan makers will need to set out evidence to support using stepped requirement figures at the plan making and examination stage, and not seek to*

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<sup>7</sup> Draft Planning Practice Guidance, Ministry of Housing, Communities and Local Government, March 2018, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/687239/Draft\\_planning\\_practice\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf)

*unnecessarily delay meeting identified development needs. Stepped trajectories will need to ensure that plan requirements are met fully within the plan period.”*

- 3.16 Whether the Council's use of a stepped housing trajectory is justified is therefore dependent on whether the new Local Plan housing requirement is significantly higher than the current adopted Core Strategy's housing requirement and whether the fact the two SUE will deliver later in the plan period justifies this approach and will not unnecessarily delay meeting identified development needs or put at risk the ability of the plan to meet fully its requirement within the plan period.

#### Core Strategy Housing Requirement

- 3.17 The adopted Core Strategy sets a housing requirement of 780 new homes each year from 2001 to 2021. This is 27% higher than the annual requirement set by Policy HOU 01 and there is therefore no justification for a stepped trajectory in this regard as there has been no increase in housing requirement.

#### Strategic Site Delivery

- 3.18 As discussed above, Breckland is facing a significant affordability crisis which needs to be addressed in the Local Plan through an uplift in housing delivery above baseline projections of household growth. Any reduction in this uplift to allow time for strategic sites to come forward therefore requires significant justification to demonstrate that it will not unnecessarily delay delivery. The Council's justification is counterintuitive in this respect as paragraph 3.6 of the plan states that it seeks to deliver a more balanced approach to housing delivery across the district, but then seeks to justify the stepped trajectory to reflect the delivery timescales of the two SUEs which do nothing to help deliver a more balanced spatial strategy.
- 3.19 Under Question 4.3, this statement demonstrates that the Council have been highly optimistic in their delivery projections for the two SUEs which adds further weight against arguments for a stepped trajectory as it could put at risk the ability of the plan to meet fully its housing requirement within the plan period. There is no evidence to suggest that it wouldn't be possible for the Council to meet its full annual housing requirement in the next five year if it were to allocate more sites outside of Thetford and Attleborough in line with its vision of a more balanced approach to housing delivery and we therefore consider the use of the stepped trajectory to be wholly unjustified.

#### **Suggested Changes to the Plan**

- 3.20 In order to make the plan sound, we consider that Policy HOU 01 needs amending to remove the proposed stepped trajectory and Policy HOU 02 needs amending to lower the projected delivery at the two SUEs (by 500 homes at Attleborough and 1,000 at Thetford) and increase the delivery at other locations through

making additional housing allocations elsewhere in the plan. One of these new policy allocations should be the re-allocation of Land at Greenfields Road, Dereham for the higher level of development proposed in Orbit Homes’ current full planning application.

**Policy HOU 01 – Development Requirements (Minimum)**

To enable the District to meet future housing needs the Local Plan will provide for no less than ~~15,298~~ 17,060 new homes between 2011 and 2036, an average of ~~612~~ 682 dwellings per annum.

~~The annualised level of new housing provision will increase during the plan period, from 584 per year from 2017/18 – 2021/22 to 622 per year from 2021/22, as reflected in the housing trajectory~~

**Policy HOU 02 – Level and Location of Growth**

Housing growth will be distributed in line with the following individual settlements targets:

Tier of Hierarchy	Percentage of Growth	Settlement	Completions / Commitments (2011- March 2017) and saved allocations	Housing Target for additional dwellings to 2036 ^	Housing Allocations included within the Local Plan	Total (Completions and Commitments 2011-March 2017 + Housing Target)
Key Settlements	?	Attleborough	1,808	<del>2,650</del> <u>2,150</u>	<del>2,650</del> <u>2,150</u>	<del>4,458</del> <u>3,958</u>
		Thetford	<del>3,668</del> <u>2,668</u>	0	0	<del>3,668</del> <u>2,668</u>
Market Towns	?	Dereham	797	<del>750</del> <u>809</u>	<del>750</del> <u>809</u>	<del>1,547</del> <u>1,606</u>

**N.B.** Significant further work is obviously needed to identify additional sites to meet both the increased OAN and the projected under-delivery of the two SUEs. The above changes therefore simply recommended changes to the delivery at the SUEs and the increase needed in the housing figure for Dereham to re-allocate Land at Greenfields Road for 279 dwellings.

**New Policy – Dereham Housing Allocation 6**

**Land at Greenfields Road, Dereham**

Land amounting to 12.32 hectares is allocated for a residential development of approximately 279 dwellings.

## **4.0 MATTER 12 – ENVIRONMENT (POLICIES ENV 01, ENV 02, ENV 03, ENV 04, ENV 05, ENV 06, ENV 09 AND ENV 10)**

### **Background**

- 4.1 Orbit Homes' application at Greenfields Road, Dereham has been recommended for approval in three separate planning committee reports and deferred twice due to concerns raised by Dereham Town Council regarding the correct level and type of outdoor playing space required. The application was reported to the planning committee on 8 May 2017 with a full report from officers which recommended the conditional grant of planning permission. In the event members resolved to defer determination on the single ground that they required further information on the application of policy DC11 of the Adopted Core Strategy which sets the Council's requirements for outdoor playing space contributions. Officers then prepared a report for the reconsideration of the application at the meeting of the committee on 31 July 2017 in which they gave their reasons for advising members that the application as it then stood complied with policy DC11. However, the application was not then considered as the applicant wished to prepare a report on viability relating to the offer of 25% affordable housing. A report was subsequently submitted to the Council and accepted by it after taking advice from their own consultant. The application was again before the committee on 18 December 2017 with a further report from officers recommending the grant of permission. This time the application was again deferred by members on the grounds that "the location of the MUGA be re-engineered and re-positioned to allow greater distances from adjacent dwellings" (i.e. a matter relating to the provision of outdoor playing space).
- 4.2 In response to this latest decision by members to defer the application, Orbit submitted a revision of the proposals to reduce the number of dwellings from the 285 dwellings first proposed (reduced to 284 for the December meeting) to 279 dwellings, and, despite that decrease in dwellings, increasing the provision of outdoor playing space from 1.64ha in May 2017 to 2.01ha in the current proposal in order to create sufficient space for a 30m offset from the Multi-Use Games Area (MUGA) to the nearest dwelling. The current proposal overprovides in terms of the total quantity of outdoor playing space by 0.35ha against a Policy DC11 requirement for 1.66ha, but having recommended the application for approval 3 times, officers have now also raised concern regarding the type of outdoor playing space provided and in particular the level of formal sports provision proposed.
- 4.3 In response to the concerns raised by officers, Orbit Homes have sought the legal opinion of both junior and senior counsel and the Council have sought their own legal opinion from junior counsel. The result of which is a difference of opinion regarding the extent to which Policy DC11 allows informal recreation to count towards outdoor sports provision.

- 4.4 Under Matter 12, the Inspector sets out a series of questions relating to the Environment policies in the Local Plan. Orbit's representations to the Breckland Local Plan Pre-Submission Publication (September 2017) raised concern regarding the justification for Policy ENV 04 proposing the application of a rural standard of outdoor playing space in urban areas. This section expands upon this point and draws on Orbit Homes' now extensive experience of Policy DC11 of the adopted Core Strategy (which is very similar to Policy ENV 04) in answering the following inspector's question.

**Question 12.8 – Is Policy ENV 04 justified and effective, insofar as it does not recognise the need for different types of open space?**

- 4.5 Policy ENV 04 sets a requirement for 2.56ha of outdoor playing space per 1,000 population to be provided in new developments. This requirement is then broken down in 0.8ha of children's play space and 1.76ha of outdoor sport area. The policy then states that on sites of 200 dwellings and above, a minimum of 2 LEAPS and Outdoor Sport Area should be provided.
- 4.6 Policy ENV 04 is essentially a carbon copy of Core Strategy Policy DC11, with the exception of its proposed use of Fields in Trust's (FIT) rural standard of 2.56ha of outdoor playing per 1,000 population instead of the urban standard of 2.4ha used in Policy DC11 (which results in a slightly lower outdoor sport area requirement of 1.6ha per 1,000 population). As outlined above, there is significant ongoing debate between legal counsel regarding the correct interpretation of Policy DC11 with regards to the definition of outdoor sports area and the extent to which the entire outdoor sport requirement needs to be met in formal sports areas (i.e. equipped pitches) or whether some of the requirement can be met in informal outdoor playing spaces that could fulfil a number of recreational functions. The level of debate regarding the correct interpretation of Policy DC11 is of significant concern to the effectiveness of emerging Policy ENV 04 and it is clear that further clarity is needed in the policy wording to avoid similar debates in the future. It is essential that in providing this further clarity, the policy is designed in accordance with the national guidance produced by FIT which allows for a degree of flexibility in provision and focusses on the benefits of multifunctional outdoor playing space.

Fields in Trust (FIT) Guidelines

- 4.7 Policy ENV 04 is based on the guidelines set out by Fields in Trust (FIT), of which the latest guidelines are contained in their Guidance for Outdoor Sport and Play Beyond the 6 Acre Standard (2015), which are an update on previously more detailed guidelines in Planning and Design for Outdoor Sport and Play (2008).

*Quantity of Provision*

- 4.8 The standards recommended by FIT are for 0.8ha of children's play space per 1,000 people (split between 0.25ha of equipped play areas and 0.55ha of informal play space) and either 1.6ha of outdoor sports provision in urban areas or 1.76ha in rural areas per 1,000 people.
- 4.9 The Council's Open Space Assessment 2015 states at paragraph 7.5 that: "According to the 'Rural and Urban Area Classification 2011', Breckland is described as mainly rural. FIT concludes that total recommended quantity standard for outdoor sport is 1.76ha per 1,000 population in a rural area as this reflects the greater number of dispersed settlements, villages and market towns in rural areas and their separate need for local facilities".
- 4.10 The Council's decision to apply FIT's rural standard in this respect fails to recognise the fact that several of the towns in the District are identified as urban in the 'Rural and Urban Area Classification 2011', as the Office for National Statistics defines urban settlements as having a population of greater than 10,000. Paragraph 3.115 of the Local Plan states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. It is therefore clearly an urban and not a rural area for the purposes of FIT's guidelines, which suggest a higher level of provision should be provided in rural areas due to the distance between facilities on offer (i.e. the distance between villages), whereas in urban areas adjoining neighbourhood facilities are much closer to one another which means they are accessible by more people. It is clear from this that the 25.6 sqm standard should apply in Breckland's rural areas, but that requiring the same standard in Breckland's towns is unjustified.

*Type of Provision*

- 4.11 In addition to providing guidance on the quantity of Outdoor Playing Space required, the FIT guidelines also contain the following useful guidance regarding the type of open space that can count towards requirements for outdoor playing space:
- Open spaces (a category that includes Outdoor Playing Space as well as other types of open space) can also provide dual use for Sustainable Drainage Systems (SuDS), delivering recreational benefits by using attenuation and storage areas for play and/or sports areas (2015 guidelines);
  - Outdoor Playing Space refers to land and facilities used for outdoor sport and play. While sport and play are the primary purposes for Outdoor Playing Space, it also contributes importantly in terms of informal recreation, amenity, and biodiversity. It is important to recognise that outdoor playing space is not the same as open space, although, as just illustrated, it often provides for a variety of open space uses. Fields in Trust's definition of outdoor playing space is 'space that is accessible and

available to the general public, and of a suitable size and nature, for sport, active recreation and play.' The priority is for land and facilities which provide a setting for physical activity, whether formal or informal, but this is not to the total disregard of more informal and passive activities and recreational pursuits. Where appropriate, multi-functionality is one of the most important attributes for open space (2008 guidance);

- The facilities below should be excluded from the definition of Outdoor Playing Space. Notwithstanding their exclusion from the definition, they can make a valuable contribution to the total recreational provision of communities, particularly those that are deficient in recreational space generally:
  - Outdoor sports facilities which are not as a matter of policy and practice available for public use, including grounds of Her Majesty's Services, educational facilities and professional sports stadia;
  - Verges, woodlands, commons, the seashore, nature conservation areas; and
  - Water used for recreation, except where it forms an interactive feature of an outdoor play area.

4.12 On the basis of the above guidance, it is clear that Policy ENV 04 fails to provide sufficient clarity on the type of open spaces that it considers can count towards outdoor playing space provision. In this respect, there is a need for the policy to include more information on:

- Sustainable Drainage Systems (SUDs) counting towards outdoor playing space provision. There is clear support in the FIT guidelines for dual use SUDs and open space and clarity is needed on this point within Policy ENV 04; and
- The definition of 'outdoor sports area', including the extent to which informal recreational space can count towards this provision. The FIT guidelines are clear in this respect that multi-functionality is one of the most important attributes for open space and that the priority in outdoor playing space provision should be for outdoor land and facilities which provide a setting for physical activity, whether formal or informal. This is not to disregard the importance of formal sports provision, but it is clear that formal sports pitches are only one type of area that can count towards outdoor sports area.

### **Suggested Changes to the Plan**

4.13 In order to make the plan sound, we consider that Policy ENV 04 needs amending to include different quantitative standards in the urban and rural areas and to provide greater clarity on the types of open space that can be included as outdoor playing space and greater flexibility with regards to the provision

of multi-functional outdoor playing space.

### **Policy ENV 04 – Open Space, Sport and Recreation**

#### New Provision

All new residential development is expected to provide a contribution towards Outdoor Playing Space equivalent to:

- 2.4 hectares per 1,000 population\* in urban settlements with a population greater than 10,000, which equates to 24m<sup>2</sup> of Outdoor Playing Space per person, the breakdown of which will be judged on a site by site basis.
- 2.56 hectares per 1,000 population\* in rural settlements with a population of less than 10,000, which equates to 25.6m<sup>2</sup> of Outdoor Playing Space per person, the breakdown of which will be judged on a site by site basis. As set out in the Open Space Assessment (2015), this 25.6m<sup>2</sup> is broken down to 17.6m<sup>2</sup> of outdoor sport area and 8m<sup>2</sup> of children's play space.

There is a presumption that for developments comprising of 25 dwellings or more that open space, sport and recreation facilities will be provided within the development site. Where on-site provision is provided, the space should be of an appropriate type to serve the needs of the development, well related to the proposed residential properties and in accordance with relevant standards.

The provision of dual use Outdoor Playing Space that also performs part of Sustainable Drainage Systems (SUDs) will be supported where the SUDs infrastructure is accessible and available to the general public, and of a suitable size and nature, for sport, active recreation and play.

Multi-functionality is a key attribute of successful outdoor playing space provision. Outdoor Playing Space refers to land and facilities used for outdoor sport and play. While sport and play are the primary purposes for Outdoor Playing Space, it also contributes importantly in terms of informal recreation, amenity, and biodiversity. The most important factors to be considered in designing Outdoor Playing Space is that it is accessible, available to the general public, and of a suitable size and nature, for sport, active recreation and play. The priority is for land and facilities which provide a setting for physical activity, whether formal or informal, but this is not to the total disregard of more informal and passive activities and recreational pursuits.

The need for different types of outdoor playing space will vary from site to site and location to location, but there will often be a greater need for formal sports provision in rural areas due to the distance

between facilities located in different villages, while in urban areas, where sports facilities in adjoining neighbourhoods are more accessible and there are fewer accessible natural resources, there will often be a greater need for informal recreational space.

~~Within a residential development of 25 or more dwellings priority should be given to the provision of children's play areas since the facility is most likely to be required within an easy reach of dwellings and will be required to conform to the 0.8ha per 1000 people standard in provision of children's play area in accordance with the NPFA standard.~~

To ensure that sufficient formal/equipped play space and sports provision is provided in developments the following standards will apply:

- On sites of 25 dwellings and above - Minimum of 1 Local Area for Play (LAP)
- On sites of 50 dwellings and above - Minimum of 2 LAPs (or equivalent provision if provided as 1 large LAP)
- On sites of 80 dwellings and above - Minimum of 1 Local Equipped Area for Play (LEAP)
- On sites of 200 dwellings and above - Minimum of 2 LEAPs and an equipped outdoor sport area\*\*
- On sites of 400 dwellings and above - Minimum of 1 Neighbourhood Equipped Area for Play (NEAP) and an equipped outdoor sport area\*\*

\*\* Examples of equipped outdoor sports areas include sports pitches, courts, a multi-use games area (MUGA) or a trim trail.

(remainder of policy to continue as per current policy wording)

## 5.0 MATTER 14 – STRATEGIC URBAN EXTENSIONS, HOUSING SITE ALLOCATIONS AND SETTLEMENT BOUNDARIES

### Background

5.1 Under Matter 14, the inspector outlines several questions relating to the planned development of Dereham. As already discussed under Matters 3 and 4 above, Orbit Homes' representations to the Breckland Local Plan Pre-Submission Publication (September 2017) raised concern regarding: the failure of the SHMA to adequately consider market signals and specifically housing affordability in calculating an appropriate uplift on household projections; the over-reliance of the Local Plan on the delivery of two Sustainable Urban Extensions (SUEs) at Attleborough and Thetford; the resultant need to rely on a stepped housing trajectory due to the bulk of the delivery at these urban extensions being forecast for the latter part of the plan period; and the failure of the Local Plan to re-allocate Orbit Homes' site at Greenfields Road, Dereham for residential development or to recognise its capacity to achieve a higher level of development than currently allocated. The following inspectors question is considered relevant Orbit Homes' previous representations.

### **Question 14.16 – Is the evidence that has ruled out alternative sites put forward for allocation in Dereham sufficiently robust?**

5.2 In expanding on the previous representations, this statement has already demonstrated that the following significant changes are required to make the plan sound:

- **Policy HOU 01** should be amended to increase the OAN by 1,762 dwellings from 15,298 to 17,060, or 70 dwellings a year from 612 to 682 dwellings and to remove the proposed stepped trajectory; and
- **Policy HOU 02** should be amended to reduce the projected completions during the plan period at the Attleborough and Thetford SUEs by 500 and 1,000 homes respectively and to increase the projected completions at Dereham to account for the recommended new policy **Dereham Housing Allocation 6** which would re-allocate Land at Greenfields Road for 279 dwellings, an increase of 59 on the current allocation.

5.3 By themselves, however, these changes are not sufficient to make the plan sound, as the additional 59 dwellings at Land at Greenfields Road will only make a small dent in the additional housing requirement of 2,600 dwellings (1,762 additional OAN + 1,500 undelivered at the SUEs – 652 dwellings currently overallocated in the plan). There is therefore a clear need for additional large-scale housing development.

- 5.4 We consider that Dereham is the most sustainable location for additional housing allocations. This is demonstrated by paragraph 3.115 of the Local Plan which states that Dereham had a population of 18,609 at the 2011 census and is currently the second largest town in Breckland after Thetford. In comparison, Attleborough had a population of just 10,482 at the 2011 census and yet paragraph 1.22 of the Local Plan states that Thetford and Attleborough are considered to be 'major towns', whereas Dereham is only a 'medium sized town'. It is clear from this that Dereham has been overlooked as a location for sustainable growth and that it can sustainably accommodate many more homes than currently proposed.

### **Suggested Changes to the Plan**

- 5.5 It is clear that the evidence that ruled out other alternative sites in Dereham cannot be considered sufficiently robust as there is a clear need for more houses to come forward in the town than currently allocated if the Local Plan is to sustainably meet its true OAN. The re-allocation of Land at Greenfields Road (see suggested new policy **Dereham Housing 6** above) will help meet the increase in homes needed by delivering an uplift on the current allocation, but it is clear that additional new allocations will also be needed. We therefore consider that the alternative sites put forward for allocation in Dereham that have not yet been allocated should be reassessed and those found to be suitable should be allocated accordingly.